

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA

v.

PAUL BATEMAN

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Dkt No.: 20-cr-10012-IT

ASSENTED-TO MOTION TO ENLARGE TIME FOR FILING OF MOTIONS

Now comes the defendant Paul Bateman and requests that this Honorable Court enlarge the time for filing motions by approximately 45 days from the presently scheduled filing date of November 12, 2021.

As grounds, the defendant states that undersigned counsel entered her appearance on his case on October 27, 2021, after the defendant's prior counsel had to undertake an unexpected and extended leave. Undersigned counsel has been working to get caught up to speed on the discovery and issues in the case, and does anticipate filing a motion to suppress in this case, but due to the volume of work necessary to draft and file the pleadings and to meet with the defendant, and the timing of the deadline, she will be unable to file by the currently-scheduled filing date of November 12, 2021.

The defendant also agrees to exclude from the calculation of the time within which the defendant must be brought to trial under the Speedy Trial Act, 18 U.S.C. §3161, et seq., the period between November 12, 2021 and the newly scheduled filing date and/or status conference. As grounds therefor, the defendant states that ends of justice served by continuing the matter in order to afford his new counsel the ability to review his case materials and draft and file substantive

motions, and the parties therefore request that the Court exclude said period under the Speedy Trial Act.

Undersigned counsel has conferred with Assistant U.S. Attorney Anne Paruti and understands that the government assents to this motion.

Respectfully submitted,
PAUL BATEMAN,

By his Attorney,

/s/ Sandra Gant
Sandra Gant
B.B.O.: 680122
Assistant Federal Public Defender
Federal Public Defender Office
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Boston, MA 02210
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CERTIFICATE OF SERVICE

I, Sandra Gant, hereby certify that this document filed through the ECF system will be sent electronically to the registered participant(s) as identified on the Notice of Electronic Filing (NEF) on November 4, 2021.

/s/ Sandra Gant
Sandra Gant